

## Exhibit 41

## 3-6

Speaker	Time	Danish Transcription	English Translation	Comment
P1 Speak Intro	0:00:00	Du lytter til P1.	You're listening to P1.	
Jesper Tynell		En dag har Lisbeth Rømer fået nok.	One day, Lisbeth Rømer had had enough.	
Lisbeth Rømer		Desværre har det ikke været muligt at få opbakning til de ændringer, som var nødvendige. Vi har fået nej, nej, nej, nej hver gang.	Unfortunately, it had not been possible to get backing for the changes that were needed. We were told 'no, no, no, no' each time.	
Jesper Tynell		Som leder af Skats udbytteadministration vil Lisbeth Rømer nu gerne mødes ansigt til ansigt med ministeriets embedsmænd og forklare dem,	As head of the dividends unit of the Danish tax agency, Skat, Lisbeth Rømer now wanted to meet face to face with Ministry officials and explain to them	
Jesper Tynell	0:00:30	hvor store hullerne i systemet er. Hvordan hun og hendes kolleger udbetaler millioner af kroner i refusion af udbytteskat mere eller mindre i blinde, og hvordan de mener, at hullerne kan lukkes.	just how large the loopholes in the system were, how she and her colleagues were paying out millions of kroner in dividend tax refunds more or less blindly, and how they believed the loopholes could be closed.	
Lisbeth Rømer		Vi har jo desværre ikke fået opbakning til, at der kunne ske de ændringer, som er nødvendige for at udbytteadministrationen bliver i orden.	Unfortunately, we did not receive backing for the changes that were necessary to make the dividends unit fit for purpose again.	
Jesper Tynell		Så hun beslutter sig for selv at tage direkte kontakt til en af ministerens folk i Skatteministeriets departement.	She therefore decided to make direct contact with a member of the Minister's staff in the Department of Taxation.	
Jesper Tynell	0:01:00	Hun kontakter dem, der kan få lovgivningen lavet om. Det fortæller Carl Helmann, der er fuldmægtig i ministeriet. Det bekræfter en af hans kolleger i departementet.	She made contact with the people who could get the legislation changed. Carl Helman, a clerk in the Ministry, explains. His story is corroborated by one of his colleagues in the department.	

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Male1		Hun indbyder min kontorchef og jeg til morgenmad, hvor vi kan drøfte, hvad der egentlig er tale om, fordi det kontor i departementet altså det kontor, som jeg sad i, der udarbejder reglerne, også videre, og hvis vi skal lovgive om det, så var det der.	She invited my office manager and me to breakfast, where we could discuss what was actually going on, because the office in the Department, in other words the office I was in, was responsible for drawing up the rules, including new rules, and if we were to legislate on this, that was where.	
Jesper Tynell	0:01:30	En tidlig morgen kort efter er to af ministerens jurister på vej ud til Skattecenter Ballerup uden for København.	Early one morning shortly afterwards, two of the Minister's lawyers headed to the Ballerup Tax Office just outside Copenhagen.	
Carl Helman		Min kontorchef før jeg tager ud til det her morgenmads møde, og det er meget fint. Vi får serveret. Der er en kollegial stemning, fordi det er det samme system, vi er i. Den gang havde udbytteadministrationen sæde i Ballerup, så det foregår hos dem.	My office manager and I went out for this breakfast meeting, and it was really nice. They served us. There was a collegial atmosphere because it was all the same system we were part of. At the time, the dividends unit was based in Ballerup, so they hosted.	
Jesper Tynell		Da de denne morgen sætter sig sammen til bords	As they sat down together that morning,	
Jesper Tynell	0:02:00	mange år før udbytteskandalen bliver offentligt kendt, har Lisbeth Rømer og hendes kolleger allerede i flere år forsøgt at trænge igennem med advarsler og løsningsforslag. Da hun har budt velkommen med kaffe, ost og brød, sætter hun også hurtigt alvoren på programmet.	many years before the dividends scandal became public knowledge, Lisbeth Rømer and her colleagues had already been trying for several years to get through to their superiors with warnings and proposed solutions. After a welcome of coffee, cheese and bread, she quickly moved to emphasize the seriousness of the situation.	
Carl Helman		Hun kommer med markant advarsel om, hvad det kan medføre, hvis man ikke gør noget ved det her. Så kan det ende i et markant skattesnyd i forhold til Danmark. Der er mange millioner kroner,	She gave a pronounced warning about what could happen if nothing were done. There could end up being significant tax fraud involving Denmark. Millions of kroner	
Carl Helman	0:02:30	man går glip af, hvis der ikke vil gøre noget ved det her. Det er den mundtlige advarsel, som Lisbeth kommer med på det her morgenmasset møde.	would be lost if no action were taken. That was the verbal warning that Lisbeth gave at that breakfast meeting.	

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Jesper Tynell		Men de løsningsforslag, som Lisbeth Rømer samtidig lægger på bordet, kræver, at bankerne hurtigere skal fortælle Skat, hvem aktionærerne er. Det vil pålægge bankerne en administrativ byrde, og det passer umiddelbart dårligt med regeringens målsætning om at nedbringe	However, the proposed solutions that Lisbeth Rømer brought to the table at the same time would require the banks to be quicker to tell Skat who their shareholders were. That would place an administrative burden on the banks, which immediately rubbed up against the government's goal of reducing	
Jesper Tynell	0:03:00	de administrative byrder for erhvervslivet, herunder fra bankerne, forklarer Carl Helman. Så selvom Lisbeth Rømers advarsler gør indtryk under mødet ...	the administrative burden on business, including for the banks, explains Carl Helman. So, even though Lisbeth Rømer's warnings did make an impression during the meeting...	
Carl Helman		Jeg forstod godt problemstillingen. Jeg forstod godt deres råb om hjælp.	I understood the problem well. I fully understood their cries for help.	
Jesper Tynell		Så tænker han samtidig, at det bliver svært at få lov til at føre hendes løsningsforslag ud i livet.	But at the same time he was thinking that it would be tricky to get the green light to implement her proposed solutions.	
Carl Helman		Så man sidder stadig med dagsordenen administrative byder. Det må ikke skærpes ved lovgivning. Det skal snarere lettes, og det styrende for, at man nok er	So the administrators' agenda stayed as it was. There would be no tightening up of the legislation. On the contrary, red tape was to be cut, and this principle would guide	
Carl Helman	0:03:30	mere eller mindre afvisende over for Skats ønsker om lovændringer på det her område.	the decision to more or less dismiss Skat's desire for changes in the law in this area.	
Jesper Tynell		Det her er "De hemmelige aktionærer", en undersøgelse af, hvorfor huller, der har ført til formodet milliardsvindel med udbytteskat, ikke er blevet lukket. Når man har kendt til hullerne i årevis. Jeg hedder Jesper Tynell velkommen til tredje afsnit: "Byrdebarometeret".	You're listening to "The Secret Shareholders", an investigation into why loopholes that allegedly led to billions of kroner worth of dividend tax fraud were not closed. When those loopholes were known about for years. My name is Jesper Tynell. Welcome to Episode 3: "The Burden Barometer".	

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Jesper Tynell	0:04:00	På sin første arbejdsdag, noget tid inden morgenmadsmødet i Ballerup, ankommer Carl Helman til den store bygning på havnefronten ud til Københavns Havn. Skatteministeriets departement. Da han denne dag går gennem svingdøren i sensommeren 2007, er det nyt for ham at arbejde her i huset med udsigt over vandet direkte over	On his first working day, some time before the breakfast meeting in Ballerup, Carl Helman arrived at the large building on the waterfront by the Port of Copenhagen. The Department of Taxation. As he walked through the revolving door in the late summer of 2007, it was still new to him to be working here in this building, with its view across the water	
Jesper Tynell	0:04:30	til Christiansborg. Men det, han skal beskæftige sig med, er ikke helt nyt for ham. Med i tasken har han otte års erfaring med kontrol af skatteforhold fra sit tidligere job som jurist i en stor dansk kommune.	to the seat of Danish government at Christiansborg. Yet what he was dealing with was not entirely new to him. He brought with him eight years of experience of auditing tax affairs from his previous job as a lawyer in a large Danish municipality.	
Carl Helman		Jeg kommer fra at sidde med skattekontrol.	I had a background in tax auditing.	
Jesper Tynell		Da han kommer ind ad døren og tager jakken af, går der ikke lang tid, før han får brug for sin viden og erfaring.	He would hardly have chance to walk in the door and take off his jacket before he would need to make use of that knowledge and experience.	
Carl Helman		En af de første sager, jeg får, da jeg starter i september 2007, angår spørgsmål om udbytteskat,	One of the first cases I got when I started there in September 2007 was about dividend tax,	
Carl Helman	0:05:00	navnlig i forhold til udenlandske aktionerer og refusion af udbytteskat.	specifically in relation to foreign shareholders and the refunding of dividend tax.	
Jesper Tynell		Efter få dage i jobbet modtager Carl Helman nemlig et notat fra Skat, forklarer han. Et notat, der advarer om, at Skats udbytteadministration ude i Ballerup tilbagebetaler udbytteskat uden at have oplysninger om, hvem udbyttedtagerne er.	After a few days in the job, Carl Helman received a memo from Skat, he explains. A memo warning that Skat's dividends unit in Ballerup was refunding dividend tax despite not having any information about who the dividend recipients were.	

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Carl Helman		Der er et kontor i Skat, der hedder udbytteadministrationen under Lisbeth Rømer, og hun har henvendt sig og endnu en gang gjort	Skat had an office known as the dividends unit, under Lisbeth Rømer, and she had come forward and once again	
Carl Helman	0:05:30	opmærksom på nogle problemer, der med den administration og de regler, der er, hun skal administrere. Og så bliver jeg bedt om at undersøge, hvordan og hvorledes, op og ned, kigge på det.	drawn attention to some problems relating to the unit and the rules she was required to administer. And so I was asked to look into the hows and whys and give the issue a good all-round examination.	
Jesper Tynell		I notatet af 15. september 2007 fra Hovedcenter på Østerbro påpeger Skat nogle af de huller i systemet, der gør det vanskeligt for Lisbeth Rømer og hendes kolleger at kontrollere, om de folk, de refunderer millioner af kroner til rundt omkring i verden, nu også har ret til at få udbetalt	In a memo from Head Office in Copenhagen's Østerbro district dated September 15, 2007, Skat pointed out some of the loopholes in the system that were making it difficult for Lisbeth Rømer and her colleagues to verify whether the people around the world to whom they were refunding millions of kroner were actually entitled to receive	
Jesper Tynell	0:06:00	de mange penge fra statskassen. Under overskriften "Problemets beløbsmæssige størrelse" oplyser Skat, at der i 2005 og 2006 er refunderet mellem 1 og 2 milliarder kroner årligt til folk i andre lande og nævner i sin henvendelse også, at der alene i sagen om et lille fransk selskab i Paris er blevet krævet over en halv milliard danske kroner udbetalt med henvisning til, at selskabet ejede en masse danske aktier, blandt andet i TDC.	the large sums of money being disbursed by the Danish treasury. Under the heading "Scale of the problem", Skat stated that in 2005 and 2006 between 1 and 2 billion kroner were refunded annually to people in other countries, and also stated in its letter that one small French company in Paris alone had demanded more than half a billion Danish kroner on the basis that the company owned lots of Danish shares, including in [Danish telecoms giant] TDC.	
Jesper Tynell	0:06:30	I notatet påpeger Skat således flere problemer eller kontrolmæssige huller, om man vil.	In the memo, Skat thus pointed out a number of problems, or audit loopholes, if you will.	
Carl Helman		Herunder man kunne ikke følge, at det i virkeligheden var de aktionærer, som havde krav på at få refunderet dansk udbytteskat og skulle have pengene.	These included the fact that it was impossible to verify whether applicants were in fact shareholders who were entitled to a refund of Danish dividend tax and should have the money disbursed to them.	

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Jesper Tynell		Skat advarer om, at de såkaldte <i>Nominee</i> -depoter kan bruges til at sløre aktionærernes identitet, som der står og peger som noget andet på, at Lisbeth Rømer og hendes kolleger kan være nødt til at udbetale penge	In the memo, Skat warned that what are known as "nominee deposits" could be used to obscure the identity of shareholders, which it pointed out as another factor that could force Lisbeth Rømer and her colleagues to pay out money	
Jesper Tynell	0:07:00	uden at vide, hvem aktionærerne er. Blandt andet fordi anmodninger om refusion skal effektueres inden 30 dage, hvis ikke der skal løbe renter på. Men notatet lægger først og fremmest vægt på et tredje problem eller hul. Nemlig at de oplysninger, som Skat trods alt modtager om visse aktionærer, først kommer ind i januar, året efter de har modtaget udbytte af deres aktier. Altså først når Lisbeth Rømer og hendes kolleger i reglen allerede har udbetalt de mange millioner	without knowing who the shareholders were. This is because, among other things, refund requests must be processed within 30 days if no interest is to be accrued. But first and foremost, the memo emphasized a third problem or loophole, namely that the information that Skat ultimately receives about certain shareholders does not come in until January of the year after they have received dividends on their shares. In other words, only after Lisbeth Rømer and her colleagues have usually already paid out the many millions	
Jesper Tynell	0:07:30	skattekroner, og det derfor er for sent.	in tax kroner, and it is therefore too late.	
Carl Helman		Udfordringen med at fristen for indberetning af den individuelle modtager af dansk udbytte, den først forelå året efter, at kravet om refusion opstod og blev behandlet.	The challenge was that the deadline for reporting the individual recipient of Danish dividends wasn't until the year after refund claims were being made and processed.	
Jesper Tynell		Skat skriver i notatet, at der derfor er en betydelig risiko for, at der tilbagebetales udbytteskat til folk, der ikke har ret til refusion, men i virkeligheden er skattepligtige til Danmark.	In the memo Skat wrote that there was therefore a significant risk that dividend tax would be refunded to people who were not entitled to a refund, but were in fact liable to tax in Denmark.	

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Jesper Tynell	0:08:00	Det er derfor også det problem, som Skat først og fremmest beder om at få løst. At få en både fremrykket og obligatorisk indberetning af alle relevante data, som der står, så Lisbet Rømer og hendes kolleger hurtigere får at vide, hvem der er udbetalt aktieudbytte til. Det er nødvendigt, hvis man vil mindske risikoen for, at nogen uretmæssigt løber af sted med skatteborgernes penge, påpeger de i notatet.	This was therefore also the problem that Skat wanted to be solved as a priority. According to the memo, the agency wanted mandatory advance reporting of all relevant data, so that Lisbet Rømer and her colleagues would know more quickly who dividends had been paid to. This is a necessity if you want to reduce the risk of people running off with taxpayers' money to which they are not entitled, Skat pointed out in the memo.	
Female1		"For at reducere risikoen for at påføre statskassen tab, vil det være nødvendigt at ændre indberetningsfristen."	"In order to reduce the risk of inflicting losses on the Treasury, it is necessary to change the reporting deadline."	
Lisbeth Rømer		Det vigtigste problem, som skal løses, det er, at vi har brug for at vide, hvem der er modtager af udbyttet, og det får vi nu i januar året efter, men vi har brug for det tidligere.	The most important problem to be solved was that we needed to know who the recipients of dividends were, and at that stage we only found that out the following January, whereas we needed to know sooner.	
Jesper Tynell		Lisbeth Rømer og hendes kollega inde i Hovedcentret, Jette Zester, ved godt, at deres forslag om en hurtigere indberetning af	Lisbeth Rømer and her colleague at Skat Head Office, Jette Zester, were well aware that their proposal for faster reporting	
Jesper Tynell	0:09:00	aktionærerne ikke løser alt. Selv om det skulle blive vedtaget, vil nogle aktionærer, nemlig stadig være hemmelige for Skat. Forslaget er derfor kun et første skridt på vejen til også at få lukket de andre huller i systemet, forklarer Jette Zester.	of shareholders would not solve everything. Even if it were to be adopted, some shareholders would always be concealed from Skat. The proposal was therefore only a first step on the road to closing the other loopholes in the system as well, explains Jette Zester.	
Jette Zester		Det, vi gør, er, at vi beder om at få grundlagt togs Skinnerne til et videre forløb.	What we did was, we asked to have the foundations put in place for a more far-reaching process.	
Jesper Tynell		Men de mener, at forslaget også i sig selv kan løse en del problemer. Hvis de hurtigere får at vide, hvem der bliver udbetalt aktieudbytte	But they did believe that the proposal as it stood could solve a number of problems. If they were told more quickly who dividends were paid to	



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Jesper Tynell	0:09:30	til og ikke først får det oplyst den 20. januar året efter, så vil det i sig selv gøre det muligt for dem at tjekke og kontrollere nogle af de mange refusioner. Gøre det muligt for dem at se, om nogle af dem, der vil have udbetalt penge, i hvert fald formelt set også er dem, der har fået udbetalt aktieudbytte og fået fratrullet skat. Og gøre det muligt at se, om beløbet er det rigtige, eller om nogen for eksempel har sat et par ekstra nuller bagi. Eller skrevet, at de ejer flere aktier,	and didn't have to wait until January 20 of the following year, that in itself would enable them to check and verify some of the many refunds. It would make it possible for them to see if some of those requesting refunds were the same people, at least formally speaking, who had been paid share dividends and had tax deducted. And it would make it possible to see if the amount in question was correct or if someone had, for example, added a few extra zeros. Or if they'd stated that they had more shares	
Jesper Tynell	0:10:00	end de reelt gør. Det gælder særligt for de penge, de udbetaler i refusion til utilslørede aktionærer, der har deres aktier liggende i depoter i Danmark med deres eget navn på, forklarer de to.	than they really had. This is especially true for the money paid out as refunds to undisguised shareholders who have their shares in depositories in Denmark under their own name, the two explain.	
Lisbeth Rømer		For dem vil det være muligt at lave kontrol. Man kunne gå hen og se på udskrifter fra bankerne, om de stod opført som aktionærer som individuelle aktionærer. Og så ville vi jo kunne se, om de havde ret	It would make checks on these shareholders possible. We would be able to go and have a look at the records from the banks to see if they were listed as shareholders, as individual shareholders. And we would then be able to see if they were entitled	
Lisbeth Rømer	0:10:30	til det refusionskrav, som de nu kom med.	to the refund claims they were making.	
Jette Zester		For langt en stor del af dem, vil vi kunne målrettet gå ind og se, okay, du har fået det her udbytte. Okay, vi kan godt se, at du har ret til at få en refusion.	For the vast majority of them, we'd be able to specifically go in and see, okay, you received this dividend. Okay, we can see that you're entitled to a refund.	
Lisbeth Rømer		Hvis vi havde set nogle uretmæssige på de mennesker, som havde deres aktier navnenoteret i et dansk pengeinstitut i depot, så ville vi have kunnet fange dem.	If we were to spot anything nefarious in respect of those people who had their shares registered as deposited in a Danish bank, we would be able to catch them.	

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Lisbeth Rømer	0:11:00	Hvis de så ikke havde krav på den udbytteskat, så ville vi selvfølgelig stoppe udbetalingen til vedkommende og sige, at det havde I ikke krav på.	If they were not entitled to the dividend tax in question then of course we would stop the payment to the person involved, stating that they were not entitled to it.	
Jesper Tynell		Men en hurtigere indberetning af, hvem der er udbetalt aktieudbytte til, vil i nogle tilfælde også kunne bruges til at opdage og sætte en stopper for unavngivne aktionærer, altså dem med aktier i <i>Nominee</i> - eller <i>Omnibus</i> -depoter, hvis de prøver at snyde sig til	However, faster reporting of who has been paid a share dividend could in some cases also be used to detect and put a stop to the practice of unnamed shareholders, i.e. those with shares in "Nominee" or "Omnibus" depositories, trying to cheat their way	
Jesper Tynell	0:11:30	at få udbetalt penge, de slet ikke har krav på. Indberetningerne vil for eksempel kunne vise, hvis refusioner til anonyme aktionærer bliver så store, at de sprænger rammen for, hvor meget der overhovedet er indbetalt i udbytteskat for en bestemt gruppe aktier, der ikke er sat navn på, forklarer Jette Zester.	to payments to which they have no entitlement at all. The reports would make it possible to see, for example, if refunds to anonymous shareholders became so large that they exceeded the total amount paid in dividend tax for a given group of shares without names, Jette Zester explains.	
Jette Zester		Dem, vi ikke får navnene på, kan du lave en forholdsvis afstemning, eller vi kan dele dem ud på de enkelte <i>Omnibus</i> -depoter	For the ones where we don't receive names, we could do a proportional split, or we could allocate them to the individual Omnibus depositories	
Jette Zester	0:12:00	og så sige, men det nytter jo ikke noget for den, den lægger langt ud over rammen. Det ville være en stor hjælp, men det er klart det de første skinner. Det er fundamentet.	and so on, but that's no help at all for the one that goes way over the limit. That would be a big help, but it would clearly be only the first step. It would be the foundations.	
Jesper Tynell		Da Carl Helman sætter sig og læser advarslerne og løsningsforslagene i notatet fra Skats hovedcenter kan han godt se problemet.	As Carl Helman sat down to read the warnings and proposed solutions in the memo from Skat Head Office, he could certainly see the problem.	

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Carl Helman	0:12:30	Jeg kan jeg godt gennemskue, at der er et kontrolproblem, og det hænger sammen med, at det var noget, jeg i forbindelse med mit jurastudium skrev om især skatteret og nogle problemer om det at snyde og så videre.	I could absolutely see that there was an auditing problem, it was something that tied in with what I'd written about in connection with my law studies, specifically about tax law and some issues relating to fraud and the like.	
Jesper Tynell		Men som embedsmand i Skatteministeriets departement sidder han samtidig selv med et andet problem. De løsninger, som Skat foreslår, passer ikke rigtigt sammen med regeringens politik, forklarer han.	But, as an official in the Department of Taxation, he also had another problem. The solutions proposed by Skat didn't really fit in with government policy, he explains.	
Jesper Tynell	0:13:00	Det bekræfter flere andre embedsmænd i Skat og Skatteministeriets departement.	This is something confirmed by a number of other officials within Skat and the Department of Taxation.	
Carl Helman		Det således, at denne regering har en målsætning om at nedbringe de administrative byrder for erhvervslivet.	The fact was that the government had a goal of reducing the administrative burden on business.	
Jesper Tynell		Et mål om at nedbringe erhvervslivets administrative byrder, som landets statsminister Anders Fogh Rasmussen, gør en stor indsats for nu.	A goal of reducing the administrative burden on business that Denmark's Prime Minister, Anders Fogh Rasmussen, was heavily pushing at the time.	
Anders Fogh Rasmussen		Og denne indsats vil blive fulgt op af yderligere lettelser i økonomiske og administrative byrder i de følgende år.	And these efforts were to be followed by further easing of financial and administrative burdens in the following years.	
Jesper Tynell		Men hvis bankerne og selskaberne hurtigere	But if the banks and businesses were to be required to report	

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Jesper Tynell	0:13:30	og i større omfang skal indberette oplysninger om aktionærene til Skat, så vil det umiddelbart påføre dem flere og ikke færre administrative byrder. Derfor er Skats forslag ikke bare i strid med regeringens politik. Forslaget går nærmest i den stik modsatte retning af, hvad regeringen har besluttet og skrevet ned i sine mange planer og rapporter om at lette de administrative byrder. For eksempel i strategiplanen "Vækst med vilje", hvor der står,	more detailed information about shareholders to Skat more quickly, that would immediately increase – rather than decrease – their administrative burden. This meant that Skat's proposals didn't just run counter to government policy, they represented a move in almost the exact opposite direction of what the government had decided and included in its many plans and reports about easing administrative burdens. One such example was the "Plan for Growth" strategic plan, which stated	
Jesper Tynell	0:14:00	at målet er at afskaffe op til en fjerdedel af de arbejdsopgaver, som regeringen betegner som administrative byrder.	that the goal was to abolish up to a quarter of those work tasks that the government categorized as administrative burdens.	
Male1		Det er regeringens ambition, at de administrative byrder for erhvervslivet skal falde år for år og i 2010 være reduceret med op til 25 procent.	It was the government's stated ambition to cut administrative burdens for the business community year on year, and to have reduced them by up to 25% by 2010.	
Carl Helman	0:14:30	Og der er udmeldt nogle måltal for hvert ministerium, og det er også Skatteministeriet. Det vil sige, at hvis man indførte nogle nye byrder, så skal vi helst finde nogle andre lempelser. Hvis man skulle indføre nogle ændringer, som gør det nemmere at kontrollere, at de aktionærer, der får refunderet dansk udbytteskat, er de reelt de mennesker, de siger, de er. Har de krav på at få udbetalt refunderet udbytteskat?	And some target figures were announced for each ministry, including the Ministry of Taxation. This meant that, if we were to introduce new burdens, we would really need to come up with some way of cutting burdens somewhere else. [You'd have to do that] if you were to introduce changes to make it easier to check that shareholders receiving a refund of Danish dividend tax really are who they say they are, whether they really are entitled to a refund of dividend tax.	
Jesper Tynell		Så spørgsmålet er: Er der reelt nogen, der snyder med refusionerne og i givet fald hvor meget? Det er noget af det, som Carl Helman og hans kontorchef	So the question was: is anyone really cheating the refund system, and if so by how much? That was one of the things that Carl Helman and his office manager	

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Speaker	Time	Danish Transcription	English Translation	Comment
Jesper Tynell	0:15:00	gerne vil vide, da Lisbeth Rømer kontakter dem og inviterer dem ud for at spise morgenmad sammen med hende og hendes kolleger og de to embedsmænd fra Skatteministeriets departement der for en morgen kører ud og besøger udbytteadministrationen i Ballerup.	wanted to know when Lisbeth Rømer contacted them and invited them over to eat breakfast with her and her colleagues, and the two Department of Taxation officials drove over one morning and visited the dividends unit in Ballerup.	
Carl Helman		Der er vi så ude. Det er også meget hyggeligt, men hun gør også klart, at hun gør rede for, at hun mener, der er alvorlige problemer, og at der er væsentlige risici forbundet med reglerne, som det er.	So, there we were. It was all very convivial, but she also made it clear that she was aware, that she believed, that there were serious problems and that there were significant risks associated with the rules as they stood.	
Jesper Tynell	0:15:30	Hvilken dato de helt præcist mødes og spiser morgenmad sammen i Ballerup er uklart, men flere kilder i Skatteministeriets departement mener, at morgenmads mødet i Ballerup finder sted omkring dette tidspunkt i efteråret 2007, og flere mødedeltagere forklarer, at Carl Helman og hans kontorchef på mødet umiddelbart sætter spørgsmålstegn ved, hvor store problemerne med refusion af udbytteskat egentlig er.	The exact date they met for breakfast together in Ballerup is unclear, but several sources in the Department of Taxation believe that the breakfast meeting in Ballerup took place around this time in the autumn of 2007, and several people who were at the meeting stated that Helman and his office manager immediately raised the question of how big the issues with dividend tax refunds really were.	
Carl Helman		Der foregår så meget snyd på så mange planer, og der kom mange mennesker, fine medarbejdere sidder på deres område	So much cheating goes on on so many levels and there were a lot of people coming, talented colleagues in their own specialist areas	
Carl Helman	0:16:00	med moms eller punktafgiftersager. Men lige på vores område er der stor risiko for snyd. Men det skulle virkelig være mere håndfast. Det skulle være påviseligt.	of VAT or excise duty cases, yet it was in our specific area there was apparently such a great risk of cheating. It really needed to be more robust. It needed to be provable.	

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Speaker	Time	Danish Transcription	English Translation	Comment
Jesper Tynell		Så udgør den mangelfulde kontrol med refusion af udbytteskat blot en betydelig risiko, som Skat og Lisbeth Rømer skriver i notatet. Eller ved de, om der også rent faktisk bliver svindlet med skatteborgernes penge? I givet fald for hvor meget? Står det værre til end så mange andre steder i Skat,	The inadequate auditing of dividend tax refunds thus quite simply represented a significant risk, as Skat and Lisbeth Rømer wrote in the memo. Or did they know whether taxpayers' money was actually being scammed? And if so, how much? Were things any worse than in so many other departments within Skat,	
Jesper Tynell	0:16:30	hvor deres kolleger også mener, at kontrollen er svag og derfor også banker på døren i ministeriet og beder om ny lovgivning og mere kontrol?	where their colleagues also thought that auditing was weak and so were also banging on the Ministry's door demanding new legislation and more auditing?	
Carl Helman		Vi har en indgroet skepsis over, om der bliver smurt for tykt på. Der var så mange andre områder, hvor der var problemer og svig og så videre. Hvorfor var dette specielt i forhold til andre områder? Det kunne man ikke lige se umiddelbart i hvert fald. Vi kunne ikke aflæse det noget sted.	We had an ingrained skepticism about whether people were laying it on too thick. There were so many other areas where there were issues and fraud and what have you. Why was this special compared to other areas? You couldn't immediately see this anyway. We couldn't read it anywhere.	
Leif Norman Jeppesen	0:17:00	Men den indgroede skepsis forsøger Lisbeth Rømer at mane i jorden, den morgen hun møder ministeriets embedsmænd ansigt til ansigt over morgenmaden og kaffen, hun serverer for dem. På mødet forklarer Lisbeth Rømer endnu en gang, hvorfor det er et problem for hende og hendes kolleger, at bankerne først indberetter navnene og kun nogle af navnene på aktionærerne året efter, at de har fået udbytte af deres aktier. Ligesom Lisbeth Rømer på mødet også fortæller om flere	But Lisbeth Rømer attempted to overcome that ingrained skepticism that morning she met the Ministry officials face to face over the breakfast and coffee she served them. At the meeting, Lisbeth Rømer explained once again why it was problematic for her and her colleagues that the banks only reported the names – and then only some of the names – of shareholders the year after they received dividends from their shares. At the meeting, Rømer also talked about a number of	
Jesper Tynell	0:17:30	andre problemer eller huller i systemet, forklarer Carl Helman.	other problems with or loopholes in the system, Carl Helman explains.	

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Speaker	Time	Danish Transcription	English Translation	Comment
Carl Helman		Allerede her fra første møde påpeger Lisbeth Rømer, at der er problemer med de her såkaldte <i>Omnibus</i> -depoter, og der kan man ikke følge sporet af den individuelle aktionær, der ejer aktier i et dansk selskab, om de har krav på at få refunderet dansk udbytteskat.	Right from the first meeting, Lisbeth Rømer pointed out that there were problems with what were known as "omnibus" depositories, where it was impossible to follow the trail of an individual shareholder who owned shares in a Danish company and whether they were entitled to a refund of Danish dividend tax.	
Jesper Tynell		Det gælder blandt andet i en stor sag, som Lisbeth Rømer og hendes kolleger netop lige har haft, påpeger de,	This was the case, among other things, in a major case that Lisbeth Rømer and her colleagues had just had, they pointed out,	
Jesper Tynell	0:18:00	ligesom de gør i notatet. Nemlig sagen om det lille franske selskab i Paris, der på baggrund af et simpelt regneark krævede over en halv milliard danske kroner udbetalt, og for nylig fik det ved at henvise til, at banken ejede en masse danske aktier, blandt andet i TDC, forklarer Carl Helman.	as they also did in the memo. This was the case of a small French company in Paris that had demanded payment, on the basis of a simple spreadsheet, of over half a billion Danish kroner, and had recently achieved this by citing that the bank owned lots of Danish shares, including in TDC, Carl Helman explains.	
Carl Helman		Lisbeth Rømer-organisationen fortæller om TDC sagen. Hele den sag opsummerede alle de frustrationer, der var omkring det gældende regelsæt,	Lisbeth Rømer's organization told us about the TDC case. The whole case summed up all the frustrations that existed around the current set of rules.	
Carl Helman	0:18:30	man ikke kunne vide med sikkerhed, om man udbetalte refunderet dansk udbytteskat til de rette modtagere. Og i dette tilfælde en halv milliard. Det er allerede i 2006, man peger på det meget åbenlyse eksempel og den erkendelse, det giver. Og dermed kan man også formulere meget tydeligt, hvad for nogle udfordringer, det er? Og hvad det vil kræve af ændringer for at rette op på det.	It was impossible to know with certainty whether refunded Danish dividend tax was being paid to the correct recipients. And in this case it concerned half a billion kroner. This very obvious example and the realization it gives rise to was being pointed out as early as 2006. And it was thus also possible to spell out very clearly what kind of challenges there were. And what changes would be required to rectify that situation.	

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Speaker	Time	Danish Transcription	English Translation	Comment
Jesper Tynell		Og det formulerer Lisbeth Rømer og hendes kolleger også	And Lisbeth Rømer and her colleagues did indeed spell that out	
Jesper Tynell	0:19:00	på mødet, fortæller han, formulerer og fremlægger deres forslag til, hvordan man kan lukke mange af hullerne i systemet.	at the meeting, he says. They spelled it out and presented their proposals for how to close many of the loopholes in the system.	
Carl Helman		De siger også, der er de løsninger. Man kunne overveje den buket af løsninger, som skulle fungere samlet set. Men det kan måske også være nogle enkelte elementer i det, som kan fungere og at gøre rede noget problemet. Her navnligt at ændre lovgivningen og tidspunkterne for angivelse af indberetning for, hvem der er de enkelte aktionærer, der har krav på refusion af dansk udbytteskat.	They also put forward solutions. You could consider the package of solutions that would get the job done between them. But there might also be some individual elements within it that could work to tackle part of the problem. In particular, changing the legislation and the deadlines for reporting the names of individual shareholders who are entitled to a refund of Danish dividend tax.	
Carl Helman	0:19:30	Man kan følge dem (intelligible), at dem der får refunderet udbytteskat, er de personer, der har ret til at få det.	They can be tracked [unintelligible] so that those who receive a refund of dividend tax are the ones entitled to it.	
Jesper Tynell		Lisbeth Rømers og hendes kollegers præsentation af problemerne gøres således større og større indtryk på Carl Helman, efterhånden som mødet skrider frem.	Lisbeth Rømer and her colleagues' presentation of the problems made a greater and greater impact on Carl Helman as the meeting progressed.	
Carl Helman		Vi må anerkende, at Skat meget sagligt har præsenteret nogle udfordringer i det her, da Skat ikke reelt kan se, om de refusioner, de foretager for dansk udbytteskat,	We had to acknowledge that Skat had very objectively presented some challenges in this area, as they really couldn't tell whether the refunds they were making in respect of Danish dividend tax	
Carl Helman	0:20:00	havner i rette hænder. De stod med mange millioner, der skulle refunderes, men de kunne ikke se, om det var tilfældet, eller om det var snyd.	were ending up in the right hands. They were facing requests for many millions in refunds, but they couldn't tell whether they were legitimate or whether there was fraud.	



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Speaker	Time	Danish Transcription	English Translation	Comment
Jesper Tynell		Men da morgenmaden er slut, og de skal til at gå, vil de to jurister fra Skatteministeriets departement alligevel ikke rigtig svare på, om de nu vil være med til at ændre reglerne og lukke hullerne i systemet. Som ansat i Skatteministeriets departement er identifikationen med regeringens	Yet when breakfast was over and everyone was about to leave, the two lawyers from the Department of Taxation still didn't really answer about whether they would now help to get the rules changed and the loopholes in the system closed. As an employee of the Department of Taxation, the level of identification with government	
Jesper Tynell	0:20:30	politik nemlig samtidig stor, fortæller Carl Helman.	policy is also great, explains Carl Helman.	
Carl Helman		Der er embedsmænd i departementet, der er med departementet og dermed også på regeringens politik, og man skal være opmærksom på administrative byrder for erhvervslivet. Det var fint, at vi har lyttet på, hvad Skat har sagt, at det vil vi så lige kigge nærmere på, men man skal også passe på. Man skal ikke stille for meget i udsigt.	There were officials in the Department who were involved with the Department and therefore also behind the government's policy, and therefore there had to be an awareness of administrative burdens for business. It was right for us to listen to what Skat had to say, and we would then take a closer look into it, but we also had to be careful. We couldn't let get expectations too high.	
Jesper Tynell	0:21:00	Præcis hvornår Carl Helman og hans kontorchef spiser morgenmad med Lisbeth Rømer og hendes kolleger ude i Ballerup, er som sagt uklart. Men jeg kan se af dokumenterne, at Carl Helmans, kontorchef på et andet møde inde i Skatteministeriets departement den 11. september 2007 beslutter, at ministeriets folk på baggrund af henvendelsen fra Skat nu vil kigge lovgivningen igennem på udbytteskatteområdet og udarbejde et notat	As we said already, exactly when Carl Helman and his office manager had breakfast with Lisbeth Rømer and her colleagues out in Ballerup is not clear. But I can see from the documents that, at another meeting within the Department of Taxation on September 11, 2007, Carl Helman's office manager decided that, at Skat's request, Ministry staff would now review the legislation in the area of dividend tax and draw up a memo	

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Speaker	Time	Danish Transcription	English Translation	Comment
Jesper Tynell	0:21:30	om problemstillingerne. I den store bygning med udsigt over København sætter embedsmændene i Carl Helmans kontor sig derfor og udarbejder et omfattende notat som svar på henvendelsen fra Skat. Et notat, hvori de loyalt og detaljerede gengiver de problemer, Skat påpeger, men hvor de samtidig også konkluderer:	about the issues. In the large building with a view over Copenhagen, the officials in Carl Helman's office therefore set to work drawing up a comprehensive memo in response to Skat's communication. A memo in which they reproduced the problems pointed out by Skat faithfully and in detail, but in which they also concluded that	
Male2		"Der er dog næppe udsigt til snarlige ændringer af indberetning af udbytte."	"There is, however, little prospect of imminent changes in the reporting of dividends."	
Jesper Tynell		Så hvad ender I med at svare Skat?	So what did you end up responding to Skat?	
Carl Helman	0:22:00	Som udgangspunkt "nej".	Basically, "no".	
Jette Zester		Svaret vi får tilbage på det her ønske er, at der er næppe udsigt til snarlige ændringer. Vi får et nej.	The answer we got back to our request was that there was little prospect of imminent changes. We got a "no".	
Lisbeth Rømer		Der er ingen lydhørhed i Skatteministeriet for at ændre noget. Det var et nej til vores forslag, og vi får ikke ændrede frister, og vi får ikke mulighed for at få en samlet	There was no amenability in the Ministry of Taxation to the idea of changing anything. It was a "no" to our proposals, and we didn't get the deadlines changed, and we didn't get the opportunity to get combined	
Lisbeth Rømer	0:22:30	indberetning og angivelse fra alle selskaber. Øv.	reporting and declaration from all companies. Oof.	
Carl Helman		Men man kunne også sige, at notatets konklusion er i overensstemmelse med regeringens politik, og det har været den politik, som embedsmændene i Skatteministeriet, herunder jeg selv skal følge og fremme regeringspolitik på det område. Så der er altså ikke noget kontroversielt i det. Det er fordi, det følger regeringens politik.	But it was also the case that the conclusion of the memo was in line with government policy, and it was that policy that the Ministry of Taxation officials, including myself, had to follow and we had to promote government policy in this area. So there was nothing controversial about it. That's because it was in line with government policy.	

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Speaker	Time	Danish Transcription	English Translation	Comment
Jesper Tynell	0:23:00	Men svaret fra Skatteministeriets departement er ikke alene et nej. Notatet til Skat kan også give indtryk af, at det slet ikke er	But the answer from the Department of Taxation was not just a no. The memo to Skat could also have given the impression that it was not at all	
Jesper Tynell	0:23:30	ministeriets ansvar, men derimod Skats eget ansvar at løse problemerne med kontrol af refusion af udbytteskat, uden at ministeriet og Folketinget behøver at ændre lovgivningen på området. Bolden bliver på den måde sparket tilbage, hvor den kom fra, oplever flere embedsmænd i Skatteministeriets departement.	the Ministry's responsibility, but rather Skat's own responsibility, to solve the issues with verification of dividend tax refunds, without the Ministry and the Danish Parliament, the <i>Folketing</i> , having to change the legislation in this area. The ball was being booted back from whence it came, as far as a number of Department of Taxation officials were concerned.	
Carl Helman		Jeg synes, det er et pseudosvar, men man kan i hvert fald det, der er sket siden og ved siden så. Jeg skal næsten få dårlig samvittighed	For me it was a pseudo-answer, but at least you can see what has happened since and alongside it. I almost felt guilty	
Carl Helman	0:24:00	over det, fordi det er at stikke blå i øjnene på kolleger. Jeg synes, de har påpeget nogle væsentlige problemer og så får de sådan en papnæse. Det er jeg er da lidt ked af det. Det er jo det. Det skrevne ord lyver ikke.	about it because it was deceiving colleagues. I thought they'd pointed out some significant problems and they just got fobbed off. I am a little sorry about that. It really was that. It's there in black and white.	
Jesper Tynell		I notatet skriver embedsmændene i Carl Helmans kontor, at Skat hurtigt selv må	In the memo, the officials in Carl Helman's office wrote that Skat must try to solve	
Jesper Tynell	0:24:30	prøve at løse problemerne ved at ændre rentebestemmelsen i vejledningen på området. På den måde vil Skat kunne vente med at udbetale de mange refusioner til året efter, når Skat har fået oplysninger ind. Altså uden at der af den grund løber renter på.	the problems itself without delay by changing the interest rate provision in the guidelines in this area. By doing so, they contended, Skat would be able to delay paying many refunds until the following year, by which time it would have received the necessary information. In other words, without interest accruing as a result.	

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Speaker	Time	Danish Transcription	English Translation	Comment
Carl Helman		Man kan sige, at hvis man anmoder om dansk udbytteskat i marts, så skal man vente helt til 20. januar året efter for at modtage refusion. Det er det, forslaget går ud på.	It could be stated that, if you were to apply for Danish dividend tax in March, you would have to wait until January 20 of the following year to receive a refund. That was the gist of the proposal.	
Jesper Tynell	0:25:00	Men for det første viser det sig senere usikkert, om det overhovedet kan lade sig gøre at ændre rentereglerne administrativt uden først at ændre renteloven. Og for det andet vil forslaget under alle omstændigheder ikke løse de problemer, som Lisbeth Rømer og hendes kolleger står med ude i Skattecenter Ballerup, når de til daglig refunderer den ene million skattekrone efter den anden uden at vide om dem, de sender pengene til, reelt har ret til refusion	But, first of all, it later turned out to be uncertain whether it was even possible to change the interest rate rules administratively without first changing the Interest Act. And, secondly, this proposal would in any case not solve the problems facing Lisbeth Rømer and her colleagues at Ballerup Tax Office, where they were refunding millions upon millions of kroner in tax on a daily basis without knowing whether or not the people they were sending the money to were actually entitled to a refund	
Jesper Tynell	0:25:30	af udbytteskat. Det er Carl Helman egentlig godt klar over, forklarer han.	of dividend tax. Carl Helman was well aware of that, he explains.	
Carl Helman		Det løser ikke problemet for de mange eller for det altovervejende store flertal af sager. Der er tale om cirka 19.000 ansøgninger, der skal behandles om året.	It didn't solve the problem for many or for the vast majority of cases. We're talking about around 19,000 applications being processed each year.	
Jesper Tynell		Det bekræftes også af en anden embedsmand i Skatteministeriets departement. Det fremgår sådan set også af Skatteministeriets notat til Skat. Heri står der, at man netop ikke bare kan lade de mange sager ligge	This was also confirmed by another official within the Department of Taxation. It can also be seen from the Ministry of Taxation's memo to Skat. The memo stated that it wasn't possible to just leave many cases	
Jesper Tynell	0:26:00	til året efter og så vente med at udbetale pengene der. Som der står i ministeriets svar:	until the following year and delay refund payment until then. As the Ministry's response stated:	

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Speaker	Time	Danish Transcription	English Translation	Comment
Male3		"... skal man selvfølgelig være opmærksom på hensynet til en rimelig hurtig og smidig tilbagebetaling af indeholdt udbytteskat. Med udbytteadministrationens omfang og karakter af masseadministration er der grænser for, hvor langvarige og dybtgående undersøgelser udbytteadministrationen kan forventes at foretage af grundlaget for den enkelte ansøgning."	"... clearly consideration must be given to the notion of a reasonably quick and smooth refund of withheld dividend tax. Given the size of the dividends unit and the nature of mass administration, there are limits to how long and in-depth any investigations the dividends unit could be expected to carry out in connection with each individual application could be."	
Carl Helman		Man skal have miseren af vejen. Man kan ikke have	You have to get the misery out of the way. You can't have it	
Carl Helman	0:26:30	den hober sig op. Man skriver også, at man skal foretage en hurtig og smidig behandling og få ekspederet sagerne, og det er det der krav på ifølge reglerne.	piling up. It was also stated that applications must be quickly and smoothly processed and cases resolved, and that was what the rules required.	
Jesper Tynell		Så når Skat foreslår en række løsninger, der kræver lovændringer her, og I siger nej, det vil vi ikke lave, men peger på en mulig løsning. Så er det reelt ikke en løsning på deres problem?	So when Skat proposed a number of solutions that required changes to the law in this area, you said no, we're not going to do that, but pointed out a possible solution. So, was that not really a solution to their problem?	
Carl Helman		Nej, egentlig ikke. Det må jeg indrømme den dag, og jeg vil sige det på den måde, at den løsning	No, actually it wasn't. I had to admit that that day, and let me put it like this: the solution,	
Carl Helman	0:27:00	eller flig af løsning, som departementet pegede på i forhold til Skat. Det løste mere departements problem, altså departementets politiske problem med administrative byrder end det løste Skats meget konkrete problemer i forhold til at skulle behandle anmodningerne om refusion af udbytteskat.	or fragment of a solution, that the Department put forward in relation to Skat, it was more of a solution to the Department's problem, i.e. the Department's political problem of administrative burdens, than it was a solution to Skat's very specific problems in relation to having to process requests for a refund of dividend tax.	

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Speaker	Time	Danish Transcription	English Translation	Comment
Jesper Tynell		Skats konkrete problemer er Carl Helman og hans kolleger i ministeriet sådan set helt med på, bekræfter de i notatet til Skat, hvori de lægger Skats oplysninger til grund og skriver:	Carl Helman and his colleagues in the Ministry were fully aware of Skat's specific problems, they confirmed in the memo to Skat, in which they took note of Skat's information, writing:	
Male4	0:27:30	"Udbytteadministrationen tilbagebetaler stort set indeholdt dansk udbytteskat i henhold til dobbeltbeskatningsoverenskomster uden mulighed for at kontrollere andet, end at den begrænsede skattepligt er attesteret."	"By and large, the dividends unit refunds withheld Danish dividend tax in accordance with double taxation agreements without the possibility of verification, other than checking that limited tax liability has been certified."	
Lisbeth Rømer		Man kan ikke vide sig sikker på, at det er de rigtige mennesker, der får refunderet dansk udbytteskat, fordi man ikke har de oplysninger. Man kan ikke engang afdække eller kontrollere, at de pågældende personer, der anmoder om at få solgt dansk udbytteskat, har fået udbetalt udbytte og ejer	You couldn't know for sure that it was the right people who were getting a refund of Danish dividend tax, because you didn't have the information. We couldn't even find out or check if the persons in question applying to have Danish dividend tax refunded had received dividends and owned	
Carl Helman	0:28:00	de pågældende danske aktier. Det kunne man ikke løse ved det her.	the Danish shares in question. This proposal would not have solved this.	
Jesper Tynell		Så det svarer Skat her fra Skatteministeriets departements side. I hvor høj grad løser det deres problem med at kontrollere refusion af udbytteskat?	So that was the answer to Skat from the Department of Taxation's end. To what extent did this solve their problem in relation to the verification of dividend tax refunds?	
Carl Helman		Det løser ikke nogen problemer. Det var erkendelsen.	It didn't solve any problems. That was the realization.	

Speaker	Time	Danish Transcription	English Translation	Comment
Jesper Tynell	0:28:30	Fra sit skrivebord i den store bygning på havnefronten med udsigt til Christiansborg oplever Carl Helman derfor, at Lisbeth Rømer og hendes kolleger ud i Ballerup bliver fanget i en ond cirkel. En ond cirkel, der opstår, fordi ingen med sikkerhed ved, om og præcis hvor meget der bliver snydt for med refusion af udbytteskat. Det er svært at sætte tal på.	From his desk in the large building on the waterfront with a view to the seat of Danish government at Christiansborg, Carl Helman could therefore see that Lisbeth Rømer and her colleagues in Ballerup were caught in a vicious circle. A vicious circle that arose because no-one knew with any certainty whether there was cheating going on with dividend tax refunds and if so exactly how much. It was hard to put a number on.	
Carl Helman		Vi har en politisk situation, og vi har administrative byrder. Vi skal håndtere det politisk. Vi kan ikke se,	We had a political situation and we had administrative burdens. We had to handle it politically. We didn't know	
Carl Helman	0:29:00	at der snydes massivt med de små 13 milliarder. Det kan vi ikke se her. Vi kan ikke engang se, at det er millioner.	that there were massive levels of fraud going on amounting to nearly 13 billion. We couldn't tell that. We didn't even know it was in the millions.	
Jesper Tynell		Og så længe ingen kan se, hvor mange penge der eventuelt i praksis bliver snydt for, så er der ingen, der ved, hvor meget statskassen kan spare ved at lukke hullerne i systemet. Derfor kan Carl Helman og hans kolleger ikke lave en <i>cost benefit</i> -analyse, der viser regeringen, om det kan betale sig at gøre en undtagelse og dispensere fra dens politik	And as long as no-one had any idea how much money could actually be being swindled in practice, no-one realized how much the Danish Treasury could save by closing the loopholes in the system. So Carl Helman and his colleagues were not in a position to carry out a cost-benefit analysis to show the government whether it would be worth its while to make an exception	
Jesper Tynell	0:29:30	og alligevel øge de administrative byrder fra bankerne på lige præcis det her område. En <i>cost benefit</i> -analyse, som regeringens komite vedrørende reduktion af administrative byrder inden for det finansielle område skriver, at man bør lave for at sikre, at banker og andre finansielle virksomheder undgår at blive pålagt byrder, hvor afkastet ikke står mål med omkostningerne.	and deviate from its policy and actually increase the administrative burden on the banks in this specific area. According to the government's Committee on Reducing Administrative Burdens in the Financial Sphere, a cost-benefit analysis should be performed in order to ensure that banks and other financial companies avoid having burdens imposed where the benefit does not measure up to the costs.	

3-6

Speaker	Time	Danish Transcription	English Translation	Comment
Carl Helman		Man kan påvist ved beløb, at der bliver snydt så og så meget. Kriterieret var, at det skulle være et aktualiseret problem.	With the figures, you could demonstrate that there was fraud going on, and how much. The criterion that applied was that you had to present a problem with accurate figures.	
Carl Helman	0:30:00	Man skulle vise det. Det var ikke nok at påpege en risiko eller bare en høj risiko, der skulle vise, at der ryger så mange milliarder eller bare millioner ud af den danske statskasse som snyd.	You had to prove it. It wasn't enough to point out a risk or even a high risk, you had to show that such and such many billions or just millions were making their way out of Danish treasury coffers through fraud.	
Jesper Tynell		På den måde bliver Lisbeth Rømer og hendes kolleger fanget i en ond cirkel. Så længe de ikke ved mere om aktionærerne, kan de ikke dokumentere, hvor meget der bliver snydt for. Og så længe de ikke kan dokumentere, hvor meget der bliver snydt for, kan de altså ikke få mere	That's how Lisbeth Rømer and her colleagues became caught in a vicious circle. Until they knew more about shareholders, they couldn't document how much fraud was going on. And until they could document how much fraud was going on they couldn't	
Jesper Tynell	0:30:30	at vide om aktionærerne. Og så længe de ikke ved mere om aktionærerne, kan de ikke dokumentere, hvor meget der bliver snydt for. Og så videre og så videre i ring, forklarer Carl Helman. Det bekræfter en af hans kolleger i Skatteministeriets departement, ligesom det også understøttes delvist af dokumenter i sagen.	find out more about shareholders. And until they knew more about shareholders, they couldn't document how much fraud was going on. And so on and so forth, round and round in circles, as Carl Helman explains. This was confirmed by one of his colleagues in the Department of Taxation, and was also backed up in part by the documents in the case.	
Carl Helman		Der bliver lidt strid om (intelligible) en ond cirkel skal. Skatteministeriet har en politisk dagsorden, der siger, at Skat skal dokumentere det. Skat siger, vi har ikke de regler, der gør, at vi kan afdække det,	There was a bit of a dispute about [unintelligible] a vicious circle. The Ministry of Taxation had a political agenda that dictated that Skat had to document it. Skat said that they didn't have the rules in place that make it possible to uncover the fraud,	



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Speaker	Time	Danish Transcription	English Translation	Comment
Carl Helman	0:31:00	så det bliver sådan en fastlåst konflikt, hvor man ikke kan komme ud af stedet, og i sidste ende er det, Skatteministeriet, der sidder med lovgivningen, som har foden på bremsen.	so what we had was this deadlocked conflict that no-one could get out of, and ultimately the Ministry of Taxation had the legislation on its side and so had its foot firmly on the brakes.	
Jesper Tynell		Så man lod dørene til statskassen stå åben? Alene fordi man ikke kunne dokumentere, at der også har været nogen at stjæle i statskassen, for det anede man ikke.	So they just left the doors to the Treasury open? Just because there was an inability to document that there was something to steal in the Treasury, because no-one knew.	
Carl Helman		I yderste konsekvens kan man sige, det er tilfældet.	In the extreme case it can be said that that was true.	
Jesper Tynell	0:31:30	Da Lisbeth Rømer og hendes kolleger ude i Ballerup modtager Skatteministeriets notat og afslag, går det hurtigt op for dem, hvad den fastlåste situation betyder for deres mange udbetalinger af millioner af kroner fra statskassen.	When Lisbeth Rømer and her colleagues out in Ballerup got the Ministry of Taxation's memo and the refusal it contained, it quickly dawned on them what the deadlocked situation meant for their many payments of millions of kroner from the national Treasury.	
Lisbeth Rømer		Det betyder, at vi ikke har noget at kontrollere, for vi havde ikke nogen	It meant we had nothing to audit because we had no	
Lisbeth Rømer	0:32:00	oplysninger. Så var det igen i blinde, desværre.	information. So sadly, it meant continuing to be blindfolded.	
Jesper Tynell		Om Lisbeth Rømer herefter tager sin telefon og ringer direkte ind til departementet og forsøger at bryde den onde cirkel. Om det derfor først er nu morgenmadsmødet i Ballerup finder sted, sådan som en af embedsmændene husker det. Eller om det er noget helt tredje, der gør udslaget, er vanskeligt at fastslå. Men i hvert fald sætter Carl Helman og hans kolleger sig et par måneder senere i november 2007	Whether Lisbeth Rømer then picked up her phone and called the Department directly in an attempt to break the vicious circle, whether it was only now that the breakfast meeting in Ballerup took place, as one of the officials remembers it, or whether it was something else completely that made the difference is difficult to determine. But in any case, Carl Helman and his colleagues sat back down a few months later, in November 2007,	

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Speaker	Time	Danish Transcription	English Translation	Comment
Jesper Tynell	0:32:30	igen og skriver et notat om de problemer og løsningsforslag, som Lisbeth Rømer og hendes kolleger har lagt på Skatteministeriets bord. Et notat, der endnu engang gengiver nogle af problemerne og nu denne gang eksplicit vejer dem op imod regeringens politik om at nedbringe de administrative byrder.	and wrote a memo about the problems and proposed solutions that Lisbeth Rømer and her colleagues had put on the Ministry of Taxation's table. A memo that once again reproduced some of the problems and this time explicitly weighed them up against the government's policy of reducing administrative burdens.	
Carl Helman		Der er en vis anerkendelse af, at der er et problem, der også angivet en løsning på det.	There was a certain recognition that there was a problem, to which a solution was also put forward.	
Male4		"Skat antyder, at problemerne ved tilbagebetaling af udbytteskat har antaget et sådant	"Skat suggests that the issues around the refunding of dividend tax have assumed such	
Male4	0:33:00	omfang og karakter, at en løsning efterhånden anses for påtrængende."	a scale and nature that a solution is now considered urgent."	
Carl Helman		Men så siger vi så igen, at vi er underlagt den generelle politik omkring administrative byrder, og det er blokeringen for, at det kan komme videre.	But then we reiterated that we were subject to the general policy around administrative burdens, and that was the obstacle to moving forward.	
Male4		"En harmonisering af fristerne og oplysningskravene ved indberetning kan formentlig alene komme på tale, hvis der er tale om en lettelse af de administrative byrder for	"A harmonization of the deadlines and disclosure requirements for reporting can probably only be considered if there is a reduction in the administrative burden for	
Male4	0:33:30	borgere og virksomheder."	citizens and businesses."	
Jesper Tynell		Notatet bliver derfor opfattet som endnu en kold klud i ansigtet af Lisbeth Rømer og Jette Zester.	Lisbeth Rømer and Jette Zester therefore took the memo as another snub.	
Lisbeth Rømer		Skatteministeriet vil ikke ændre de ting, medmindre det er en lettelse af de administrative byrder.	The Ministry of Taxation would refuse to make the changes unless it was to lessen administrative burdens.	

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Speaker	Time	Danish Transcription	English Translation	Comment
Jette Zester		Skatteministeriet giver et nej. Det her vil give et merarbejde for pengeinstitutterne, hvis de skal fremrykke tidspunktet for indberetningen.	It was a "no" from the Ministry of Taxation. It would make extra work for the banks if they had to do their reporting earlier.	
Jette Zester	0:34:00	Upåagtet vigtigheden af det, fordi det synes jeg, at vi har gjort opmærksom på, at det er påtrængende, fordi man sidder i udbytteadministrationen og tilbagebetaler i blinde. Så det er påtrængende. Og det er vigtigt, og det står i rapporten. Men det bliver ligesom fejlet af bordet.	Regardless of its importance, because I think we made it clear that it was urgent, as we were there in the dividends unit just blindly giving out refunds. So it was urgent. And it was important, and it said so in the report. But it was basically brushed aside.	
Carl Helman		Vi fastholder det her med, at det er meget afgørende for departementet i det politiske øjemed, at spørgsmålet om de administrative byrder for erhvervslivet. Departementet forlangte eller forventede, at Skat	We stood by this based on the fact that the issue of the administrative burdens for business was absolutely crucial for the Department from a political point of view. The Department demanded or expected Skat	
Carl Helman	0:34:30	påviste et beløb i skattesnyd som følge af regler, som der var.	to demonstrate an amount of tax fraud as a result of the rules that were in place.	
Jesper Tynell		Der skulle lig på bordet, før man kunne få den kontrolmulighed, der gjorde, at man kunne se, om der var lig på bordet.	A disaster had to happen before you could get the tools necessary to check whether a disaster had happened.	
Carl Helman		Så er vi tilbage til den onde cirkel, eller hønen og ægget.	So we're back to the vicious circle, or the chicken and egg scenario.	
Jesper Tynell	0:35:00	Chancerne for at det lykkes at få lukket hullerne i systemet er altså ikke ligefrem store, da Lisbeth Rømer et års tid senere i august 2008 alligevel forsøger sig en gang til. Hun og hendes kolleger sidder fortsat og udbetaler den ene million kroner fra statskassen efter den anden mere eller mindre i blinde. I 2007 har de refunderet lidt over en milliard kroner. I 2008 bliver det lidt under en milliard, så hun beslutter sig for at prøve	The chances of succeeding in closing the loopholes in the system were therefore not exactly great when, a year later in August 2008, Lisbeth Rømer had another go. She and her colleagues were still paying out millions upon millions of kroner from the national Treasury more or less blindly. In 2007, they refunded just over a billion kroner. In 2008, it was heading for a little under a billion, so she decided to give	

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Speaker	Time	Danish Transcription	English Translation	Comment
Jesper Tynell	0:35:30	en ny strategi.	a new strategy a try.	
Lisbeth Rømer		Da der er gået et år, skriver jeg et nyt notat om de problemer, der fortsat er med udbytteskatadministrationen.	Since a year had passed, I wrote a new memo about the problems that there still were with regard to the dividends unit.	
Jesper Tynell		Denne gang lægger hun vægt på, at det ikke kun handler om refusionerne til udlandet, men at aktionærer i Danmark også kan snyde sig til penge, de slet ikke har ret til. Så længe systemet ikke bliver lavet om. Et budskab hun sammen med kolleger i Skat også denne gang sender helt op i nærheden af ministeren	This time, she emphasized that it was not only about refunds abroad, but that shareholders in Denmark could also swindle their way to money to which they were absolutely not entitled. Until the system was changed. A message that, together with colleagues in Skat, she once again sent right up to the vicinity of the Minister,	
Jesper Tynell	0:36:00	til Carl Helman og hans kolleger i Skatteministeriets departement.	namely o Carl Helman and his colleagues in the Department of Taxation.	
Carl Helman		Vi modtog i Skatteministeriet, (intelligible) modtog notat den 11. august 2008 udarbejdet af Lisbeth Rømer fra Skats udbytteadministration, der ikke omhandler specielt udenlandsk refusion af dansk udbytteskat i forhold til udenlandske aktionærer, men mere generelt snydstilfælde, man kunne foretage i Danmark.	In the Ministry of Taxation, we received [unintelligible] received a memo on August 11, 2008 drawn up by Lisbeth Rømer from the dividends unit at Skat that did not deal specifically with foreign refunds of Danish dividend tax in relation to foreign shareholders, but more generally with potential cases of fraud within Denmark.	

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Speaker	Time	Danish Transcription	English Translation	Comment
Jesper Tynell	0:36:30	I notatet gør Lisbeth Rømer nu gældende, at hvis hun får fremrykket indberetningen af aktionærerne og Skat får oplysningerne ind med det samme i stedet for året efter, så vil hun og hendes kolleger også bedre kunne forhindre, at folk i Danmark snyder sig til at få udbetalt udbytteskat ved for eksempel at lade et selskab indberette, at de har udloddet et fiktivt aktieudbytte til en person og derfor foregiver at have indbetalt. Lad os sige 280.000 kroner i udbytteskat.	In the memo Lisbeth Rømer now asserted that, if she could have the reporting of shareholders brought forward and Skat were to receive the information immediately instead of the following year, she and her colleagues would also be better able to prevent people in Denmark from cheating their way to dividend tax refunds by, for example, having a company report having distributed a fictitious share dividend to an individual and therefore pretending to have paid the tax. Let's take 280,000 kroner of dividend tax as an example.	
Lisbeth Rømer	0:37:00	Skatten på 280.000 kroner godskrives så personen på baggrund af en ikke foretaget indbetaling af udbytteskat. Det vil sige, at vedkommende hæver 280.000 kroner fra statskassen, som vedkommende ikke er berettiget til. Det kan vi lukke, det hul, hvis vi har samtidig indberetning og angivelse.	The tax of 280,000 kroner is then credited to the individual on the basis of a payment of dividend tax that was not actually made. In other words, the person in question receives 280,000 kroner from Denmark's national treasury to which they are not entitled. I said we could close this loophole if we had simultaneous reporting and declaration.	
Carl Helman		Man argumenterer alene ud fra en dansk problemstilling og siger, den eksisterer også. Danskerne kan også snyde	The argument was being made solely on the basis of a Danish problem, and it was being pointed out that that problem also existed. Danish people could also commit fraud	
Carl Helman	0:37:30	på grund af de samme regler det samme hul. Kontrolhul og det er samme løsning, som både bør lukke hullet i forhold til danske skatteydere og i forhold til dem, der hævder, at de skal have refunderet dansk udbytteskat, og som bor i udlandet. Det gør hun opmærksom på,	using the same rules and the same loophole, the same gap in monitoring, and the same solution applied, namely to close the loophole in relation to both Danish taxpayers and foreign residents claiming a refund of Danish dividend tax. She was pointing that out.	

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Speaker	Time	Danish Transcription	English Translation	Comment
Jette Zester	0:38:00	Vi forsøger at sige, men hør nu her. Nu har vi ligesom fået afslag, fordi vi ikke må pålægge byrder omkring refusionerne af de valutariske udlændinge og indberetninger på dem. Men vi kan altså også bruge dem på de danske skattepligtige personer og selskaber til at være på forkant, så man tidligere kan sige "her er noget galt", og måske stopper pengestrømmen, før det er for sent. Nu prøver vi det her argument. Vi prøver at få ørenlyd. Vi prøver at få et andet hul igennem.	We were trying to say, look, we were basically turned down because we weren't allowed to impose burdens in relation to refunding of foreigners in foreign currency and to reporting about them. But we could also use the changes on Danish taxpayers and companies, to be ahead of the game, so we could say "something's wrong here" earlier, and maybe stop the flow of cash before it was too late. So we tried that argument this time. We were trying to make ourselves heard. We were trying to get another loophole closed.	
Leif Jesper Tynell	0:38:30	Men selv om Lisbeth Rømer og hendes kolleger i Skat prøver at lægge endnu flere argumenter op i den ene vægtskål, så fastholder regeringen samtidig det generelle pres fra lodderne i den anden vægtskål. Hensynet til at nedbringe de administrative byrder for erhvervslivet med op til 25 procent	But even as Lisbeth Rømer and her colleagues at Skat tried to put across even more arguments to tip the scales their way, the government kept up the general pressure at its end to tip the scales the other way. This included the target of cutting administrative burdens on business by up to 25%	
Jesper Tynell	0:39:00	inden 2010. Regeringen har efterhånden ligefrem travlt. Da det nye notat havner på Carl Helmans bord i efteråret 2008, er der nemlig under to år tilbage til, at målet skal være opfyldt. Og der er stadig lang vej igen, har statsministeren understreget et par måneder forinden.	by 2010. Slowly but surely, the government was finding its hands pretty full. When the new memo landed on Carl Helman's desk in the autumn of 2008, it was less than two years until this target was due to be met. And there was still a long way to go, the Prime Minister had emphasized a few months before.	
Anders Fogh Rasmussen		Det er sådan, at de administrative byrder er siden 2008 reduceret med ti procent, og vi er blandt de EU-lande,	The fact was that administrative burdens had been reduced by ten percent since 2008, and we had	

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Speaker	Time	Danish Transcription	English Translation	Comment
Anders Fogh Rasmussen	0:39:30	der har de laveste administrative byrder. Men vi lader selvfølgelig ikke nøjes med den reduktion på de ti procent. Det er fortsat regeringens mål at lette de administrative byrder for erhvervslivet med op til 25 procent frem til 2010. Det er en meget ambitiøs målsætning, og sagen har derfor også allerhøjeste prioritet for regeringen.	among the lowest administrative burdens in the EU. But of course we weren't going to be content with that reduction of ten percent. It remained the government's goal to ease administrative burdens on business by up to 25% by 2010. This was a very ambitious goal, and the matter therefore also had top priority for the government.	
Jesper Tynell	0:40:00	Det har højeste prioritet at nå regeringens mål, mærker Lisbeth Rømer og hendes kolleger. En ting er, at de endnu ikke er kommet igennem med at indføre den øgede kontrol med aktionærerne, de ønsker. De er samtidig under pres fra andre embedsmænd i Skat for at forsøge at afskaffe nogle af de indberetninger, de faktisk får ind. Også i tilfælde, hvor det vil medføre mindre kontrol, blandt andet med udbetalingerne af aktieudbytte. Det kan jeg se af de dokumenter,	Lisbeth Rømer and her colleagues note that achieving the government's goals was top priority. One thing was that they still hadn't managed to get the increased shareholder monitoring they wanted. At the same time, they were under pressure from other officials within Skat to try and abolish some of the reports they actually did receive. And that included in cases where it would lead to fewer checks being made, among other things on the payments of share dividends. I can see that from the documents	
Jesper Tynell	0:40:30	jeg har haft adgang til. På Skatteministeriets hjemmeside er der herudover samtidig et såkaldt byrdebarometer. Byrdebarometeret viser med grønt, hvor mange procent Skatteministeriet har lempet erhvervslivets administrative byrder med, men byrdebarometeret viser samtidig med rødt, hvor langt der stadig er igen op til de 25 procent. Og det er helt deroppe, man skal, forklarer skatteminister	I've had access to. The Ministry of Taxation's website also included what it called a "burden barometer". The burden barometer showed in green the percentage by which the Ministry of Taxation had eased the administrative burden on the business community, while at the same time also showing in red how far there still was to go to reach the 25% target. And, as Minister of Taxation Kristian Jensen had declared,	

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Speaker	Time	Danish Transcription	English Translation	Comment
Jesper Tynell	0:41:00	Kristian Jensen, der samtidig kan glæde sig over, at Skatteministeriet er tættere på målet, end andre ministerier er, og indtager en flot førsteplads som det ministerium, der er nået længst. Som der står på Skatteministeriets hjemmeside i foråret 2007.	the requirement was to get the barometer right up to the top. At the same time, he was in a position to celebrate the fact that the Ministry of Taxation was closer to the target than other ministries and happily sat in first place in the league table of how far down the red-tape cutting path each ministry had gone. And the Ministry of Taxation's website said as much in the spring of 2007.	
Male5		"Jeg er glad for, at vi her i Skatteministeriet er nået så langt med at reducere byrder for erhvervslivet. Vi vil nu lægge os i selen, så vi også når det sidste stykke op til de 25 procent."	"I am pleased that we, here at the Ministry of Taxation, have come so far in reducing burdens on the business community. We will now double down our efforts to make sure that we make it the whole way to the 25% target."	
Jesper Tynell	0:41:30	Det indskærper ministeren på Skatteministeriets hjemmeside, da ministeriet stadig mangler de sidste fem procentpoint for at nå helt i mål. Det viser byrdebarometeret fortsat gennem hele 2008, at der mangler. Carl Helman sidder således i et dilemma, da han i august 2008 sætter sig ved sit skrivebord i Skatteministeriets departement for at besvare Lisbeth Rømers seneste henvendelse.	This was underlined by the Minister on the Ministry of Taxation's website, as the Ministry was still the last five percentage points short of the target. The burden barometer continued to show a shortfall throughout 2008. Carl Helman thus faced a dilemma when he sat down at his desk in the Department of Taxation in August 2008 to answer Lisbeth Rømer's latest communication.	
Carl Helman	0:42:00	Det skal umiddelbart reageres på den hændelse, der nu var, og de problemer, der var.	There had to be an immediate response to what was now happening and to the problems that existed.	
Jesper Tynell		Et dilemma, der ikke bare er et rent professionelt dilemma.	And his dilemma wasn't a purely professional one.	
Carl Helman		Jeg havde selv siddet med skattekontrol. Otte år i hvert fald i kommunerne, ikke? Så havde jeg en vis empati eller forståelse for de udfordringer, som udbyttepersonen sad med.	I had a background in tax auditing myself. Eight years in the municipalities in any case, you know? So I had a certain empathy for or understanding of the challenges that the dividends person was facing.	



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Speaker	Time	Danish Transcription	English Translation	Comment
Jesper Tynell		Og derfor måske også et helt personligt dilemma.	And therefore, perhaps also a completely personal dilemma.	
Carl Helman		Man sidder i et dilemma i departementet med den politiske dagsorden	We faced a dilemma in the department with the political agenda,	
Carl Helman	0:42:30	Det generelle om administrative byrder. De skal ikke skærpes, de skal snarere lettes. Og samtidigt ville jeg så gerne være den der fine fuldmægtige i Skatteministeriets departement og betjene ministeren og så videre og gøre det godt på den måde, så jeg var også selv i et personligt dilemma.	the general requirements about administrative burdens. They were not to be heightened, in fact they were to be eased. And at the same time I really wanted to be a good clerk in the Department of Taxation and to serve the Minister and so on and do well that way, so I was also in a personal dilemma.	
Jesper Tynell		Men Carl Helman gør sit arbejde, sætter sig ved sin computer	But Carl Helman did his job. He sat down at his computer	
Jesper Tynell	0:43:00	og begynder at skrive.	and began to write.	
Carl Helman		Jeg skriver på vegne af Skatteministeriet til Lisbeth Rømer i udbytteadministrationen, at Skatteministeriet umiddelbart ikke finder noget afgørende nyt. Man mener ikke, at man kan fremme en indre lovgivning, der retter op på de kontrolproblemer, som Skats udbytteadministration har idet en ny lovgivning i givet fald vil øge de administrative byrder for erhvervslivet og bankerne navnlig.	I wrote to Lisbeth Rømer in the dividends unit, on behalf of the Ministry of Taxation, that the Ministry did not immediately find anything crucially new. We did not believe that it was possible to bring forward internal legislation that would address the verification problems faced by Skat's dividends unit, as new legislation would, where applicable, increase the administrative burden for businesses, and in particular banks.	
Lisbeth Rømer		Og desværre så er svaret det samme, nemlig at der må ikke	And unfortunately the answer was the same, i.e. that this must not	
Jesper Tynell	0:43:30	være nogle byrder for nogen i forbindelse med det her, så kan vi ikke gennemføre det. Desværre nej. Igen, igen, igen. Det kræver virkelig, at man kan holde humøret oppe.	result in more burdens for anyone, or else it could not be implemented. Not the case, unfortunately. Again, again, again. There was a real need to keep our spirits up.	

Speaker	Time	Danish Transcription	English Translation	Comment
Jesper Tynell		Carl Helman afviser således Lisbeth Rømer og hendes kolleger ved bogstaveligt talt at citere, altså kopiere, hvad ministeriet skrev	Carl Helman thus rejected Lisbeth Rømer and her colleagues by literally quoting, i.e. copying, what the Ministry had written	
Jesper Tynell	0:44:00	sidste gang, Skat kom med sine forslag til, hvordan man kan undgå at udbetale milliarder af skattekrone i blinde.	the previous time Skat had come forward with proposals on how to avoid blindly paying out billions of kroner in tax.	
Male6		En harmonisering af fristerne og oplysningskravene ved indberetning kan formentlig alene komme på tale, hvis der er tale om en lettelse af de administrative byrder fra borgere og virksomheder.	"A harmonization of the deadlines and disclosure requirements for reporting can probably only be considered if there is a reduction in the administrative burden for citizens and businesses."	
Jette Zester		Argumentet er det samme. De kopierer det sådan set fra det tidligere svar, vi havde fået i sidste afvisning om, at det ikke ses som en lettelse,	The argument was the same. They copied it as is from the previous answer we had received in the previous rejection, i.e. that this was not seen as an easing,	
Jette Zester	0:44:30	men som en merbyrde for borgerne og virksomhederne og dermed også for depotbankerne.	but rather as an additional burden for citizens and businesses and thus also for the custodian banks.	
Carl Helman		Vi siger jo direkte til skat: "I copy-paster, så copy-paster vi også. Vores præmis for, at vi kan ændre lovgivningen, er spørgsmålet: Hvordan stiller det sig i forhold til de administrative byrder for erhvervslivet? Derfor kan det ikke lade sig gøre.	We told Skat straight, "If you copy and paste, we'll copy and paste too. Our basis for being able to change the law is the following question: What impact will it have on the administrative burdens for business? Therefore, it cannot be done."	
Jesper Tynell		Men ved regeringen godt, at Skat gentagende gange	But was the government aware that Skat had repeatedly	
Jesper Tynell	0:45:00	har påpeget, at man ikke kan kontrollere om man udbetaler udbytteskat i store mængder til folk, der ikke er berettiget til det, ved regeringen godt, at det her kan være en konsekvens af at holde fast i den målsætning?	pointed out that it was impossible to check whether dividend tax was being paid out in large amounts to people who were not entitled to it? Was the government aware that this could be a consequence of refusing to budge in respect of the red tape target?	

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Speaker	Time	Danish Transcription	English Translation	Comment
Carl Helman		Nej, ikke i forhold til de notater eller møder, som jeg havde i 2007-2008 med Skats administration.	No, not as far as concerns the memos or meetings I had in 2007-2008 with Skat officials.	
Jesper Tynell		Men hvordan skal regeringen så vide, at ingen kontrol med udbytteskat	But then how could the government know that an inability to check dividend tax	
Jesper Tynell	0:45:30	bliver konsekvensen af dens generelle politik om at nedbringe de administrative byrder? Hvis I ikke bringer de her advarsler op til ministeren og op til regeringen?	would be a consequence of its general policy of reducing administrative burdens if you don't bring these warnings up with the Minister and the government?	
Carl Helman		Der er en viden om, at der er et alvorligt problem. Men det bliver ikke nødvendigvis bragt videre til øverste politiske ansvarlige for området, skatteministeren. Samtidig med man ikke kan overskue, at der blev snydt på området. Man kan kun lige vide, at der er risiko for det.	There was an awareness that there was a serious problem. But it wasn't necessarily passed on to the top political officer in this area, the Minister of Taxation. At the same time, you couldn't see that there was fraud in this area. You could just about tell that there was a risk of it.	
Carl Helman	0:46:00	Måske en betydelig risiko? Man kan ikke sige, at det er X antal millioner, der er i spil i snyd.	Perhaps a significant risk? It wasn't possible to say there was X million kroner worth of fraud going on.	
Jesper Tynell		Og fordi de ikke kan sige, hvor mange millioner der eventuelt bliver snydt for, tager Carl Helman og hans kolleger ikke initiativ til at gå til ministeren for at få lavet reglerne om. Det gælder både her og i mange andre sager, hvor medarbejdere i Skat advarer om, at der er risiko for snyd. Det fortæller også flere andre embedsmænd i Skatteministeriets departement,	And because they couldn't say how many millions were possibly being fraudulently claimed, Carl Helman and his colleagues did not take the initiative and go to the Minister to get the rules changed. This applied both here and in many other cases where Skat employees warned that there was a risk of fraud. This is something that a number of other officials within the Department of Taxation also stated,	
Jesper Tynell	0:46:30	der bekræfter, at det fører til en ond cirkel, sådan som Carl Helman forklarer.	confirming that it led to a vicious circle, as Carl Helman explained.	

3-6

Speaker	Time	Danish Transcription	English Translation	Comment
Jesper Tynell		Så længe vi ikke kan sætte tal på, hvor mange der bliver snydt, så undlader I at informere ministeren om, at hans politik er regeringspolitik forhindrer jer i overhovedet at opdage, hvis der bliver snydt?	Was it the case that, for as long as you were unable to put figures on how much fraud was going on, you would fail to inform the Minister that his policy, government policy, was preventing you from even discovering if there was fraud going on?	
Carl Helman		Ja, vurderet på den baggrund, når du siger det sådan. Ja, det er rigtigt. Det beskriver det meget godt. Men det sker ikke med ond vilje. Det er jo også vigtigt at understrege.	Yes, judged against that background, when you put it like that. Yes, it's true. It describes the situation really well. But there was no malicious intent. It's important to stress that.	
Carl Helman	0:47:00	Jeg vil sige at spørgsmålet administrative byder for erhvervslivet. Det var et gennemgående tema og styrende princip og det, der forhindrede indgreb eller forhindrede, at man fik skærpet reglerne.	I'd like to make clear that the issue of administrative burdens for business was a theme that ran through everything and a guiding principle, and that was what prevented intervention and prevented rules being tightened up.	
Lisbeth Rømer		Man blev jo helt stiktosset. Det var jo, men det er meget, meget kedelig, at man sidder med noget, man synes er et virkelig stort problem. Og så er der reelt ingen forståelse	We were absolutely furious. It was how it was, but it was very, very frustrating to be sitting on something you think is a really big problem. And the result was that there was really no understanding	
Lisbeth Rømer	0:47:30	for problemet i organisationen, der hvor man kan beslutte, om man skal ændre noget.	of the problem in the organization with the power to decide if change was needed.	
Jette Zester		Man skærer ikke igennem over for vigtigheden af, at hele udbytteadministrationen stort set ikke kan løse deres opgave tilfredsstillende.	We couldn't get them to see the importance of the fact that the entire dividends unit was basically unable to do its job properly.	
Jette Zester		Det er det, man sådan siger. Det ser man igennem fingre med.	That's what we were saying. They just looked the other way.	
Carl Helman		Det virker umiddelbart som en meget svær situation og et dilemma. Jeg tror nok, at man er i den embedsmandsrolle,	Straight away it felt like a very difficult situation and a dilemma. I still think our job was to be civil servants,	

Speaker	Time	Danish Transcription	English Translation	Comment
Carl Helman	0:48:00	navnlig i departement, så er det en præmis. Som et levevilkår i arbejdslivet, at man har de dilemmaer, og det lever man så med, kan man sige. Det kan godt være, at det er en regering, der har en politik, hvor man ikke kan fremme sådan nogle løsninger. Så har man altid en skuffe klar til den næste regering kommer, skuffe med forslag klar, som en regering af en anden politisk farve måske vil gennemføre. Og sådan kan det køre lidt i	specifically in the Department, so that's the basis we operated on. It was a fundamental condition of our working lives, that you have these dilemmas and you live with it, you could say. It may well be that there's a government that has a policy where you can't bring forward certain solutions. So you always have a drawer ready for the next government to come in, a drawer full of proposals that are ready for a government of a different political persuasion that might want to implement them. And that's how things can	
Carl Helman	0:48:30	i mølle der, fordi man skal jo holde sammen på Danmark.	come unstuck a little, because in Denmark you have to toe the line.	
Jesper Tynell		Men da er de politiske vinde senere vender for en kort stund, og et flertal i Folketinget faktisk vedtager en ny lov, der giver mulighed for bedre at kontrollere refusion af udbytteskat, så løber de ind i en ny modstander,	But then the political winds turned for a short while, and a majority in the <i>Folketing</i> , the Danish Parliament, actually passed a new law that facilitated better monitoring of dividend tax refunds. What happened next was that they ran into a new opponent:	
Jesper Tynell	0:49:00	Bankerne og deres interesseorganisation stritter imod i brev efter brev og på møde efter møde presser bankerne på for, at de nye krav om indberetning af aktionærerne aldrig bliver ført ud i livet.	the banks and their industry association opposed the new rules in letter after letter, and in meeting after meeting the banks pushed for the new requirements for the reporting of shareholders to never be implemented.	
Lisbeth Rømer		Det er bankverden. Alle de store banker sidder der, Finansrådet sidder der, og de synes alle sammen, at det er en meget dårlig idé.	That's the banking world. All the big banks are sitting there, the Bankers' Council trade association is sitting there, and they all think it's a very bad idea.	
Jesper Tynell		Da papirerne ellers ligger klar og kun lige mangler ministerens underskrift, beder bankerne ham om	With the paperwork all but ready, with only the Minister's signature lacking, the banks ask him	
Jesper Tynell	0:49:30	ikke at skrive under.	not to sign.	

## 3-6

Speaker	Time	Danish Transcription	English Translation	Comment
Jette Zester		Alle ved stort set, også pengeinstitutterne, at vi udbetaler i blinde.	Virtually everyone, including the banks, knew that we were paying out blindly.	
Jesper Tynell		Det her er "De hemmelige aktionerer". Du har lyttet til tredje afsnit: Byrdebarometeret.	This is "The Secret Shareholders". You've been listening to Episode 3: "The Burden Barometer".	
Jesper Tynell		Signe Mansdotter har klippet og komponeret musik sammen med Marie Kildebæk, Jens Vithner er redaktør. Karen Damsgaard Sørensen og Alberte Zachø har været i redaktion. Morten Runge har indlæst citater,	Signe Mansdotter edited and composed music alongside Marie Kildebæk. Jens Vithner was the editor. Karen Damsgaard Sørensen and Alberte Zachø were in the editorial team. Morten Runge read quotes,	
Jesper Tynell	0:50:00	og jeg har tilrettelagt og skrevet manuskript. Mit navn er Jesper Tynell.	and I prepared and wrote the script. My name is Jesper Tynell.	
P1 Outro		Du kan høre flere på P1-podcasts i DR's Radio App. Det giver mening.	You can hear more P1 podcasts in DR's Radio App. It makes sense.	